

EXHIBIT C



Brian O. Watson
312-258-5845
bwatson@schiffhardin.com

233 SOUTH WACKER DRIVE
SUITE 6600
CHICAGO, ILLINOIS 60606
t 312.258.5500
f 312.258.5600
www.schiffhardin.com

June 15, 2014

VIA E-MAIL AND CERTIFIED MAIL

Michael P. Cascino
Robert G. McCoy
220 South Ashland Avenue
Chicago, IL 60607
mcascino@cvlo.com
bmccoy@cvlo.com

**Re: *Boyer v. Weyerhaeuser Co. et al.*
No. 14-cv-286**

Dear Messrs. Cascino and McCoy:

Plaintiffs state that responsive documents will be produced upon arrangement for inspection and copying in their response to Owens-Illinois's First Set of Product Specific Requests for Production Nos. 1-11. Because Plaintiffs have not produced these documents before tomorrow's expedited deposition, Owens-Illinois will suspend the deposition for the time necessary to inspect, copy, and obtain any order to then cross-examine Mr. Boyer regarding the documents.

Please provide the soonest date and time when Plaintiffs will produce the documents for inspection and copying. As you know, Plaintiffs also "must organize and label them to correspond to the categories in the request." Fed. R. Civ. P. 34(b)(2)(E)(i); *see also In re Sulfuric Acid Antitrust Litig.*, 231 F.R.D. 351, 363-64 (N.D. Ill. 2005). To avoid court-ordered relief, we specifically request Plaintiffs' compliance with Rule 34(b)(2)(E)(i).

Yours sincerely,

A handwritten signature in black ink, appearing to read 'B. Watson'.

Brian O. Watson

15640-1263
CH2\14859049.1

Watson, Brian O.

From: Watson, Brian O.
Sent: Sunday, June 15, 2014 7:50 PM
To: Blake Edwards; Bob G. McCoy (bmccoy@cvlo.com); Michael Cascino (mcascino@cvlo.com); Samuel W. Ertel
Cc: William P. Croke; Edward McCambridge; vzavala@SMSM.com; Emily Zapotocny; vzavala@SMSM.com; ellistd@fpwk.com; Joshua J. Metcalf (metcalfjj@fpwk.com)
Subject: RE: Boyer v. 3m et al. - Plaintiff's Responses to OI Discovery Requests
Attachments: 14859049_2.PDF

See attached letter.

Brian O'Connor Watson
Attorney

[vCard](#)
[View Bio](#)



233 South Wacker Drive
Suite 6600
Chicago, IL 60606
www.schiffhardin.com

t 312.258.5845
f 312.258.5600
e bwatson@schiffhardin.com

-----Original Message-----

From: Samuel W. Ertel [<mailto:swertel@cvlo.com>]
Sent: Friday, June 13, 2014 6:29 PM
To: Fischer, Matthew; Casmere, Edward M.; Watson, Brian O.; William P. Croke; Edward McCambridge; vzavala@SMSM.com; Emily Zapotocny; vzavala@SMSM.com
Cc: Blake Edwards
Subject: Boyer v. 3m et al. - Plaintiff's Responses to OI Discovery Requests

Dear Counsel:

I attach plaintiff's responses to Owens-Illinois' most recent discovery requests in this matter.

Best,

Samuel Ertel
Legal Assistant
Cascino Vaughan Law Offices, Ltd.
220 South Ashland Avenue
Chicago, IL 60607

swertel@cvlo.com
(312) 944-0600 ext 6789

Confidential & Privileged

Unless otherwise indicated or obvious from its nature, the information contained in this communication is attorney-client privileged and/or confidential information/work product. This communication is intended for the use of the individual or entity named above. If the reader of this communication is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error or are not sure whether it is privileged, please immediately notify us by return e-mail and destroy any copies--electronic, paper or otherwise--which you may have of this communication.